



## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

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Cheryl Newton  
Director, Air and Radiation Division  
U.S. Environmental Protection Agency (U.S. EPA)  
Region V  
77 West Jackson Boulevard, AR-18J  
Chicago, IL 60604-3950

Dear Ms. Newton:

I have been asked by your staff to provide clarification concerning Indiana's Section 110 State Implementation Plan (SIP) submittal in regards to the National Ambient Air Quality Standards for fine particles. The matter that requires additional clarification pertains to state authority to implement New Source Review (NSR) permitting requirements for the fine particle standards.

As with most states, Indiana has not been in a position to initiate rulemaking for NSR for fine particles due to the lack of sufficient guidance from U.S. EPA. However, I am willing to commit to having a SIP revision to U.S. EPA by April 2012, providing that Indiana receives sufficient guidance from U.S. EPA by May 1, 2011 to support Indiana's rulemaking and a federally approvable submittal. The following summarizes the key issues that Indiana will need U.S. EPA to address via guidance by May 1, 2011:

- 1) Can offset ratios be seasonal or only annual?
- 2) Can offset ratios vary among portions of the state, or must one ratio apply to the entire state?
- 3) If data supports it, can precursor pollutants addressed in Indiana's rule vary among portions of the state?
- 4) How consistent must the ratios and precursor pollutants Indiana selects be in comparison to neighboring States?
- 5) Can Indiana's demonstration rely on speciated ambient monitoring data or must it rely solely on dispersion modeling?
- 6) If speciated ambient monitoring data is used to support a demonstration, how would U.S. EPA expect Indiana to treat the precursor pollutants that account for a more significant portion of the mass than sulfur dioxide and nitrogen oxides?
- 7) If modeling is required what model is acceptable since secondary formation of precursor pollutants is essential to such a demonstration?



Indiana does not want to commit the resources to a rule and SIP development process that will result in an unapprovable submittal. If states were to proceed without sufficient guidance from U.S. EPA, the agency would receive submittals riddled with inconsistencies that would prevent U.S. EPA from proceeding with approval, necessitate guidance after the fact, and result in states having to go through the rule and SIP development process a second time.

I hope this provides the clarification sought by your staff. Please feel free to contact me at (317) 232-8222 or [kbaugues@idem.in.gov](mailto:kbaugues@idem.in.gov) should you have any further questions.

Sincerely,



Keith Baugues  
Assistant Commissioner

TWE/sad/

cc: John Mooney, U.S. EPA Region V  
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